

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Susan D. Wigenton
v.	:	Crim. No. 15-193 (SDW)
WILLIAM E. BARONI, JR. and BRIDGET ANNE KELLY	:	

THIS MATTER having come before the Court on the joint application of the undersigned parties to publicly disclose certain sentencing materials submitted by the parties in this case; William E. Baroni (Carlos F. Ortiz, Esq., appearing), and Bridget A. Kelly's (Michael Critchley, Esq., appearing) having requested that sensitive personal information be redacted from their sentencing memoranda and attached exhibits; Defendant Baroni's having requested that certain specific references to his providing information to the Federal Bureau of Investigation be redacted from his sentencing memorandum; and the undersigned parties' having reached an agreement, which is reflected in this Stipulation and Consent Order, to seal the unredacted versions of the Defendants' sentencing memoranda and attached exhibits; the Court makes the following findings:

- (1) The Defendants' sentencing memoranda and exhibits contain sensitive personal information and should be redacted;
- (2) Certain nonpublic specific facts regarding the timing and nature of Defendant Baroni's providing information to the Federal Bureau of Investigation in Defendant Baroni's sentencing memorandum should be redacted;

- (3) A clearly defined and serious injury could result should the above-referenced information not be sealed;
- (4) The least restrictive means for preventing serious injury is to seal the unredacted versions of the Defendants' sentencing memoranda and attached exhibits, while making publicly available redacted versions of those materials that omit the above-referenced personal information;
- (5) A less restrictive alternative to redacting the Defendants' sentencing memoranda and attached exhibits is not available; and

THEREFORE, for good cause shown, based on the findings set out above, as well as the agreement among the parties, and in order to preserve the confidentiality of the materials referenced above;

IT IS, therefore, on this 27<sup>th</sup> day of March, 2017,

ORDERED that the unreacted versions of the Defendants' sentencing memoranda and attached exhibits shall be filed under seal. The Court shall further note on its file for this matter that the unredacted versions of these materials are "under seal," and therefore not part of the Court's public record of this matter; and it is further

ORDERED that redacted versions of the Defendants' sentencing memoranda and attached exhibits shall be publicly filed with the Court; and it is further

ORDERED that the Government's sentencing memorandum shall be publicly filed with the Court; and it is further

ORDERED that the Clerk of the Court shall take such other steps as may be reasonably required to maintain the confidentiality of the records described above.

**For the United States of America:**

WILLIAM E. FITZPATRICK  
ACTING UNITED STATES ATTORNEY

/s/Lee M. Cortes, Jr.

Lee M. Cortes, Jr.  
Vikas Khanna  
David W. Feder  
Assistant United States Attorneys

**For Defendant William Baroni:**

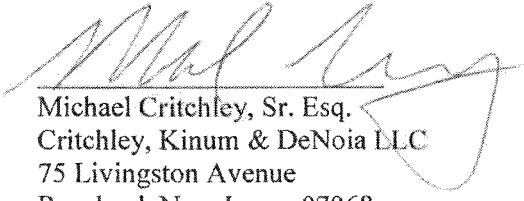
/s/Carlos F. Ortiz

Michael Baldassare, Esq.  
Baldassare & Mara, LLC  
570 Broad Street, Suite 900  
Newark, New Jersey 07102  
Carlos F. Ortiz, Esq.  
Blank Rome, LLP  
301 Carnegie Center, 3rd Floor  
Princeton, NJ 08540

**For NJ Advance Media LLC:**

Michael J. Gesualdo, Esq.  
Robinson Miller LLC  
One Newark Center, 19th Floor  
Newark, NJ 07102

**For Defendant Bridget Anne Kelly:**

  
Michael Critchley, Sr. Esq.  
Critchley, Kinum & DeNoia LLC  
75 Livingston Avenue  
Roseland, New Jersey 07068

**For Bloomberg LP, The New York Times, Dow Jones & Company, The Associated Press,  
American Broadcasting Companies, NJ Advance Media LLC, Gannett, Inc. Public Media  
NJ, New York Public Radio, and Politico**

Bruce S. Rosen, Esq.  
McCusker Anselmi Rosen & Carvelli, PC  
210 Park Ave., Suite 301  
Florham Park, NJ 07932

**SO ORDERED:**

  
**HONORABLE SUSAN D. WIGENTON  
UNITED STATES DISTRICT JUDGE**

**For the United States of America:**

WILLIAM E. FITZPATRICK  
ACTING UNITED STATES ATTORNEY

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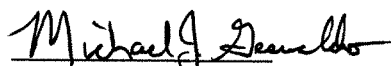
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Assistant United States Attorneys

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**For Defendant Bridget Anne Kelly:**

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**SO ORDERED:**

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UNITED STATES DISTRICT JUDGE**

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ACTING UNITED STATES ATTORNEY

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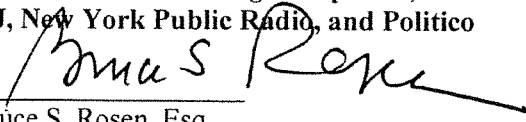
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